

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

KOHCHISE JACKSON,

Plaintiff,

Case No. 2:19-cv-13382

v.

Hon. Gershwin A. Drain

CHS TX, Inc., et al.,

Defendants.

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**PLAINTIFF'S PROPOSED VERDICT FORM**

Plaintiff Kohchise Jackson, through counsel, submits the following proposed verdict form:

## **VERDICT FORM**

We the jury unanimously answer the following questions submitted to us:

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### **ITEM NO. 1, LIABILITY:**

A. On the *Monell* claim by the Plaintiff against Defendant Corizon Health, Inc./CHS TX, Inc., we the jury find in favor of:

\_\_\_\_\_Plaintiff Kohchise Jackson

\_\_\_\_\_Defendants Corizon Health, Inc/CHS TX, Inc.

B. On the claim by the Plaintiff against Defendant Dr. Keith Papendick for deliberate indifference to serious medical needs, we the jury find in favor of:

\_\_\_\_\_Plaintiff Kohchise Jackson

\_\_\_\_\_Defendant Dr. Keith Papendick

**If you found for the plaintiff against any defendant on item A through B, continue on to Item No. 2 and Item No. 3. If you find for the defendants on both items above, stop.**

### **ITEM NO. 2, COMPENSATORY DAMAGES:**

We find that Plaintiff suffered non-economic damages in the amount of:

\$\_\_\_\_\_

**[continue on next page]**

ITEM NO. 3, PUNITIVE DAMAGES:

**You may not assess punitive damages against a defendant unless you first found against that defendant in Item No. 1, above.**

We assess punitive damages against Defendant Corizon Health, Inc/CHS TX, Inc. as follows:

\$ \_\_\_\_\_

We assess punitive damages against Defendant Dr. Keith Papendick as follows:

\$ \_\_\_\_\_

Signed,

\_\_\_\_\_

Foreperson

Respectfully submitted,

/s/ Ian T. Cross

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